

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

WILLIAM T. DIVANE, JR.,  
as the ELECTRICAL INSURANCE  
TRUSTEES,

Plaintiffs,

v.

DELECTRIC SHOP, INC.,

Defendant.

No. 07 C 6205

Judge Dow

---

**MOTION FOR DEFAULT JUDGMENT**

The plaintiffs, WILLIAM T. DIVANE, JR., et al., as the ELECTRICAL INSURANCE TRUSTEES, by their attorney, David R. Shannon, and pursuant to Fed. R. Civ. P. 55, request the Court to enter a default judgment against the defendant, DELECTRIC SHOP, INC. In support of their motion, the Trustees state:

1. The Trustees filed suit on November 2, 2007. DELECTRIC SHOP, INC. was served with summons and complaint on November 20, 2007.

2. To date the defendant has failed to file an appearance or answer to the complaint.

3. The affidavit of Mark Cavanagh, the Trustees' Collection Coordinator, is attached hereto as Exhibit A.

WHEREFORE, William T. Divane, Jr., et al., as the Electrical Insurance Trustees request the entry of default judgment against DELECTRIC SHOP, INC. in the amount of \$103,739.44. The Trustees also request the entry of an order enjoining DELECTRIC SHOP, INC. from continuing to engage in work within the scope of

work clause in the Principal Agreement and within the jurisdiction of Local 134, I.B.E.W., for so long as it is a signatory of that agreement, unless and until it furnishes the Trustees with a duly-executed standard fringe-benefit bond.

WILLIAM T. DIVANE JR., et al., as the  
ELECTRICAL INSURANCE TRUSTEES

By: /s/ David R. Shannon  
One of Their Attorneys

David R. Shannon  
Tenney & Bentley, L.L.C.  
111 West Washington Street, Suite 1900  
Chicago, Illinois 60602  
(312) 407-7800